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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION

This document relates to case no. 18-cv-09492.

MASTER DOCKET 18-md-2865 (LAK)

[PROPOSED] CONSENT JUDGMENT

WHEREAS, on June 14, 2018, plaintiff Skatteforvaltningen ("SKAT") commenced this action against defendants Tew, LP Retirement Plan ("Tew LP") and Vincent Tew, and on April 24, 2020, SKAT filed an amended complaint against the defendants (the foregoing collectively hereinafter referred to as the "Action");

WHEREAS, SKAT and defendant Tew LP now wish to resolve all the claims SKAT asserted in the Action against Tew LP;

NOW THEREFORE, without trial or adjudication of issue of fact or law, and upon Tew LP's consent, the Court finds that there is good and sufficient cause to enter this Consent Judgment, and that IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

- 1. This Consent Judgment is hereby entered in favor of plaintiff SKAT against defendant Tew LP in the amount of \$2,425,000 (US); and
 - 2. Defendant Tew LP shall be liable to pay the amount set forth in paragraph 1.
 - 3. Each party shall bear its own attorneys' fees and costs.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Consent Judgment.

Document 714 Filed 12/22/21 Case 1:18-md-02865-LAK Page 2 of 3

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Dated: New York, New York June 7, 2021

HUGHES HUBBARD & REED LLP

Marc A. Weinstein Neil J. Oxford Dustin P. Smith One Battery Park Plaza

New York, New York 10004-1482

Telephone: (212) 837-6000

Fax: (212) 422-4726

marc.weinstein@hugheshubbard.com neil.oxford@hugheshubbard.com dustin.smith@hugheshubbard.com

Counsel for Plaintiff Skatteforvaltningen (Customs and Tax Administration of the Kingdom of Denmark)

SO ORDERED:

Lewis A. Kaplan United Stated District Judge By: _

SEWARD & KISSEL LLP

Mark J. Hyland Thomas Ross Hooper One Battery Park Plaza

New York, New York 10004

Tel: (212) 574-1200 Fax: (212) 480-8421 hyland@sewkis.com hooper@sewkis.com

Counsel for Tew LP, Retirement Plan

By:

HUGHES HUBBARD & REED LLP Marc A. Weinstein Neil J. Oxford Dustin P. Smith One Battery Park Plaza New York, New York 10004-1482 Telephone: (212) 837-6000 Fax: (212) 422-4726 marc.weinstein@hugheshubbard.com neil.oxford@hugheshubbard.com dustin.smith@hugheshubbard.com

Counsel for Plaintiff Skatteforvaltningen (Customs and Tax Administration of the Kingdom of Denmark)

SO ORDERED:

Lewis A. Kaplan United Stated District Judge By: Mars J. Thy

SEWARD & KISSEL LLP Mark J. Hyland Thomas Ross Hooper One Battery Park Plaza New York, New York 10004

Tel: (212) 574-1200 Fax: (212) 480-8421 hyland@sewkis.com hooper@sewkis.com

Counsel for Tew LP, Retirement Plan